

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA

IN RE:

MERCY HOSPITAL, IOWA CITY, IOWA,  
et al,

Debtors.

Chapter 11 Bankruptcy  
Case no. 23-00623

IOWA DEPARTMENT OF REVENUE'S  
OBJECTION TO TRUSTEE'S OBJECTION  
TO ADMINISTRATIVE PROOF OF  
CLAIM #40020

COMES NOW the Iowa Department of Revenue (IDR) and in response to the Trustee's Objection to Proof of Claim #40020 filed by the IDR states as follows:

1. On March 11, 2024, the IDR filed Proof of Claim #40020 in the amount of \$769.25. The claim is an estimated liability due to the Debtors' failure to file its required Iowa sales tax return for the December 2023 post-petition tax period.
2. The Debtor now objects to the IDR's administrative claim, stating it has either been paid or the Trustee's advisor is attempting to ascertain if it has been paid.
3. The records of the IDR indicate that no return has been filed for sales tax period December 2023, nor has any payment been received. The entire amount of Claim #40020 remains due.

WHEREFORE, the IDR respectfully requests that the Court deny the Trustee's Objection to Proof of Claim #40020 filed by Iowa Department of Revenue, and for any such relief as the Court finds just and equitable.

BRENNA BIRD  
Attorney General of Iowa

By: /s/ Steve Ginther  
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#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 15<sup>th</sup> day of November, 2024, a true and correct copy of the foregoing document was filed with the Court's CM/ECF system, which sent notice to all parties receiving electronic notices, including but not limited to counsel for the Debtor.

/s/ Teresa Corbin  
Teresa Corbin